

**TECHNICAL REVIEW DOCUMENT**  
**for**  
**MODIFICATION TO OPERATING PERMIT 01OPAD212**

Trigen-Colorado Energy Corporation Cogeneration Facility  
At The Metro Wastewater Treatment Facility  
Adams County  
Source ID 0010097

Prepared by Jacqueline Joyce  
July 2003

Revised October 31, 2003 to include Back-up continuous monitoring system

**I. Purpose:**

This document establishes the decisions made regarding the requested modifications to the Operating Permit for Trigen-Colorado. This document provides information describing the type of modification and the changes made to the permit as requested by the source and the changes made due to the Division's analysis. This document is designed for reference during review of the proposed permit by EPA and for future reference by the Division to aid in any additional permit modifications at this facility. The conclusions made in this report are based on the information provided in the original request for modification submitted to the Division on June 11, 2003, e-mail correspondence, and telephone conversations with the source. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised construction permit.

**II. Description of Permit Modification Request/Modification Type**

Trigen-Colorado has requested a modification to their Title V operating permit to include alternative operating scenarios (AOS) for temporary and permanent turbine replacement at their Metro Wastewater Cogeneration Facility.

The Division considers that the addition of the AOS for permanent and temporary turbine replacement must be processed as a significant modification. A significant modification is subject to a 30-day public comment period and a 45-

day EPA review. The proposed modifications cannot be instituted until the revised operating permit has been issued.

### **III. Modeling**

The AOS for turbine replacement allows for a like-kind replacement only and therefore, no increase in emissions will result from this modification and there is no change in the dispersion characteristics. Modeling was conducted with the issuance of the construction permit that permitted the installation and operation of the turbines. Therefore no modeling is required.

### **IV. Discussion of Modifications Made**

#### **Source Requested Modifications**

The Division addressed the source's requested modifications as follows:

Although Trigen requested that their permit be revised to include the alternative operating scenario for permanent or temporary turbine replacement, the Division is only able to include the AOS for temporary replacement since the turbine is subject to RACT and RACT is subject to change. For sources that are unable to use the permanent turbine replacement AOS, temporary replacement is defined as 270 days. The Division included the AOS (July 18, 2003 version) for temporary engine replacement in the revised permit in Section I, Condition 2.2.

#### **Other Modifications**

In addition to the requested modifications made by the source, the Division used this opportunity to include changes to make the permit more consistent with recently issued permits, include comments made by EPA on other Operating Permits, as well as correct errors or omissions identified during inspections and/or discrepancies identified during review of this modification.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments on other permits, to the Trigen-Colorado Operating Permit with the source's requested modifications. These changes are as follows:

#### **Page following Cover Page**

Added language specifying that the semi-annual reports and compliance certifications are due in the Division's office and that postmarks cannot be used for purposes of determining the timely receipt of such reports/certifications.

## Section I - General Activities and Summary

Revised the language in Condition 1.1 regarding the attainment status of the Denver metro area.

Removed the language in Condition 1.6 addressing Non-Attainment Area Major New Source Review (NSR). Since the Denver metro area is no longer a non-attainment area, these provisions do not apply. In addition, this condition was moved to the “new” section 3 for PSD (see below).

Revised the alternative operating scenario language in Condition 2 regarding the cold cleaner solvent vats. With recent changes in Regulation No. 3, all cold cleaner solvent vats are exempt from APEN reporting and construction permit requirements, provided they have VOC emissions below APEN de minimis levels. Regulation No. 3, previously exempted small remote reservoir units from APEN reporting requirements and any unit that met the definition of small remote reservoir units was deemed to be in compliance with the requirements in Regulation No. 7.

Added a “new” Section 3 for PSD review requirements. This section had not previously been included since both PSD and major non-attainment area new source review were applicable and addressing both provisions was very complicated.

### Section II.1– Cogeneration Facility

Removed the second sentence in Condition 1.7, as the language was cumbersome. This sentence utilizes language from 40 CFR Part 60 Subpart GG § 60.334(b) which is indicated in the citation, so the language is not necessary.

Added the word “frequency” before the phrase “will return to the beginning” in Condition 1.7.1.

### Section II.2 – Continuous H<sub>2</sub>S Monitoring System

During the 45-day EPA review period for this modification, the source indicated that they had installed a back-up monitoring system. This back-up system meets the same quality assurance/quality control requirements as the original system. Therefore, Condition 2.3 was revised to indicate that when the continuous H<sub>2</sub>S monitoring system was unable to provide data, either a back-up monitoring system or fuel sampling could be use to replace data.

## Section III – Permit Shield

The citation in the permit shield was corrected. The reference to Part A, Section I.B.43 was changed to Part A, Section I.B.44 and the reference to Part C, Section XIII was changed to Part C, Section XIII.B.

#### Section IV – General Conditions

Revisions were made to the Common Provisions Regulation (general condition 3), effective September 30, 2002. The appropriate revisions were made to the language in the permit.

The citation in General Condition 17 (open burning) was revised. The open burning requirements are no longer in Reg 1 but are in new Reg 9. In addition, changed the reference in the text from “Reg 1” to “Reg 9”.

#### Appendices

Revised the description in Appendix A of the insignificant activity category for stationary internal combustion engines (Reg 3, Part C, Section II.E.3.xxx).